

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

T.S.,

Plaintiff,

v.

TOTE SERVICES, LLC,

Defendant.

No. 2:21-CV-00520-BJR

**STIPULATED MOTION AND
ORDER TO EXTEND DEADLINES**

I. STIPULATION

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff T.S. (“T.S.”) and Defendant Tote Services, LLC (“Tote Services, LLC”), by and through their undersigned counsel, respectfully request the Court enter the parties’ stipulation below. The parties respectfully submit that good cause exists to extend the case deadlines, as explained below.

There is good cause to adjust the case schedule to accommodate the parties’ calendars and to permit orderly and complete discovery. While both sides are working to complete discovery, they are unable to do so before the current discovery cutoff date of November 17, 2021, due to outstanding discovery and depositions that remain to be completed before both parties can be ready for trial.

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ORDER TO EXTEND DEADLINES - 1
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Trial is currently set to begin on May 16, 2022. This is the first continuance of a deadline requested in this matter. In light of both parties' need to complete additional discovery, the parties stipulate to extend the following case deadlines:

Case Event	Original Deadline	New Deadline
Reports from expert witness under FRCP 26(a)(2) due	October 18, 2021	November 17, 2021
Discovery completed by	November 17, 2021	February 18, 2022
All dispositive motions must be filed by	December 17, 2021	March 18, 2022
All motions in limine must be filed by	April 11, 2022	July 11, 2022
Joint Pretrial Statement	April 18, 2022	July 18, 2022
Pretrial Conference	May 2, 2022	August 1, 2022
Trial	May 16, 2022	August 15, 2022

IT IS SO STIPULATED.

Respectfully submitted this 25th day of October, 2021.

LAVENDER RIGHTS PROJECT

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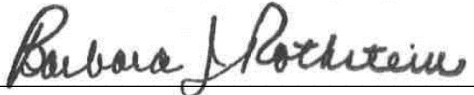
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Attorneys for TOTE Services, LLC

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2 **IT IS SO ORDERED.**

3 DATED this 2nd day of November, 2021.

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5 BARBARA J. ROTHSTEIN
6 UNITED STATES DISTRICT JUDGE
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